

SHAUB, AHMUTY, CITRIN & SPRATT, LLP

ATTORNEYS AT LAW
1983 MARCUS AVENUE
LAKE SUCCESS, NEW YORK 11042-1056
(516) 488-3300
Facsimile: (516) 488-2324
info@sacslaw.com

Erin L. Deacy-Stalzer
estalzer@sacslaw.com

June 1, 2022

The Honorable Gary R. Brown
United States District Court
Eastern District of New York
100 Federal Plaza
Courtroom 940
Central Islip, NY 11722-9014

Re: Spindel, Jillian v. Terry D. Amarat, M.D., Jon-Paul DiMauro, M.D.,
Northwell Health Long Island Jewish Medical Center, Depuy Synthes
Products, Inc., Depuy Synthes Sales, Inc., Depuy Synthes Spine Inc.
and Johnson & Johnson Inc.

Federal Case No.: 2:22-cv-03106-GRB-AYS
SACS File No. : 433-00158

To the Honorable Justice Brown:

Good afternoon. The undersigned is the attorney representing Jon-Paul DiMauro, M.D. and Long Island Jewish Medical Center s/h/a Northwell Health Long Island Jewish Medical Center in the above-entitled action, which was originally commenced by plaintiff's counsel in the Suffolk County Supreme Court on April 6, 2022 but recently removed by counsel for my named co-defendants, Depuy Synthes Products, Inc., Depuy Synthes Sales, Inc., Depuy Synthes Spine Inc. and Johnson & Johnson Inc. (collectively referred to as "the DePuy defendants").

Counsel for the removing defendants has recently forwarded a copy of Your Honor's May 27, 2022 minute entry order directing the undersigned and plaintiff's counsel to submit a letter brief with the Court regarding their position(s) regarding the DePuy defendants' removal and possible remand, with appropriate authorities, by June 3, 2022. The order further directs for the Depuy defendants to submit a responsive letter brief within a week, thereafter.

Having contacted and conferred with counsel earlier today and acknowledging Your Honor's Part Rule I, with the appreciated approval and consent of plaintiff's counsel, Dennis Desousa, Esq., and co-defendants' counsel, J.T. Larson, Esq., I am writing to request a two week extension of time to **June 17, 2022** for myself and plaintiff's counsel

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to submit our letter briefs, and to **June 24, 2022** for counsel for the DePuy defendants to submit their responsive letter brief. The requested extension is believed to be required for all parties to best be able to fully and accurately convey to the Court their respective positions with citation to supportive authorities referenced for Your Honor's consideration. With thanks for this Court's hoped for consideration and acquiescence of the request relayed herein, I greatly appreciate Your Honor's time and I remain

Very truly yours,



Erin L. Deacy-Stalzer

cc:

David J. Lorber & Associates, PLLC
Attorneys for Plaintiff
100 North Country Road
Setauket, New York 11733
Attn: Dennis Desousa, Esq.
dennis@djlaborlaw.com

Barnes & Thornburg, LLP
445 Park Avenue, Suite 700
New York, New York 10022-8634
Attn: J.T. Larson, Esq.
jt.larson@btlaw.com